UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF FLORIDA MIAMI DIVISION

CASE NO.: 1:22-cv-23684-JAL

ADISLEN PAZ DEL SOL,

Plaintiff,

v.

HOMESTEAD HOSPITAL, INC.,
BAPTIST HEALTH SOUTH FLORIDA,
INC., PARAGON CONTRACTING
SERVICES, LLC, d/b/a TEAMHEALTH
FLORIDA¹, and HEALTHCARE
REVENUE RECOVERY GROUP, LLC,
d/b/a HRRG, ARS ACCOUNT
RESOLUTION SERVICES,

Defendant.

JOINT NOTICE OF SETTLEMENT AS TO DEFENDANT HEALTHCARE REVENUE RECOVERY GROUP, LLC D/B/A ARS ACCOUNT RESOLUTION SERVICES; and PARAGON CONTRACTING SERVICES, LLC, d/b/a TEAMHEALTH FLORIDA

Plaintiff, Adislen Paz Del Sol, and Defendants, Healthcare Revenue Recovery Group, LLC, d/b/a ARS Account Resolution Services, and Paragon Contracting Services, LLC, d/b/a Teamhealth Florida by and through their undersigned counsel, hereby notify the Court that the aforementioned Parties have reached a settlement in the above-captioned matter.

¹ Th correct name of this Defendant is Paragon Contracting Services, LLC.

The parties are in the process of finalizing the terms of settlement and respectfully request that this Court allow thirty (30) days to complete the settlement, during which time Parties request this Court retain jurisdiction over this matter until fully resolved. The Parties anticipate that a joint stipulation to voluntary dismissal with Prejudice will be filed within thirty (30) days.

Dated this 2nd day of February 2023.

/s/ Monica Amor.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing has been electronically filed on February 2, 2023, with the Clerk of the Court by using the electronic filing system. I further certify that the foregoing has been sent via electronic transmission to the following: Monica Amor, Esquire of Amor Law Firm, P.A., at mamor@amorlaw.com. (Attorneys for Plaintiff), Nina C. Welch, Esquire, Peter R. Goldman, Esquire, and Daniel Alvarez, Esquire at nina.welch@nelsonmullins.com; peter.goldman@nelsonmullins.com; and daniel.alvarez@nelsonmullins.com; (Attorneys for Paragon Contracting Services, LLC); and Matthew L. Lines, Esquire, and Catherine A. Mancing, Esquire at Lines@irlaw.com, Isicoff@irlaw.com; and Mancing@irlaw.com (Attorneys for Defendants, Homestead Hospital, Inc., and Baptist Health South Florida, Inc.).

/s/ Ernest H. Kohlmyer, III

Ernest H. Kohlmyer, III, Esq., LL.M. Florida Bar No.: 110108 skohlmyer@shepardfirm.com Shepard, Smith, Kohlmyer & Hand, P.A. 2300 Maitland Center Parkway, Suite 100 Maitland, Florida 32751 Telephone (407) 622-1772 Facsimile (407) 622-1884 Attorneys for Defendant, Healthcare Revenue Recovery Group, LLC d/b/a ARS Account Resolution Services